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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,  Plaintiff,  v.  LORAN ST. CLAIR,  Defendant.	MOTION FOR DISCLOSURE OF GOVERNMENT'S EXPERT TESTIMONY   Case No. 2:09CR-00291DB
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Loran St. Clair, by and through his attorney and pursuant to Rule 16(a)(1)(G), Federal Rules of Criminal Procedure, moves this Court for an order requiring the Government to provide a written summary of any testimony that it intends to introduce as expert testimony under Rules 702, 703 and 705, Federal Rules of Evidence, at the trial of this matter. In regard to said summary, the Government should identify and describe:

1. The witness's qualifications;
2. The witness's opinions; and
3. The bases and reasons for these opinions, including:
  - a. Written and oral reports, tests and investigations;
  - b. Opinions of other experts;

c. Any information that might be recognized as a legitimate basis for and opinion under Federal Rules of Evidence 703.

WHEREFORE, the defendant respectfully requests that if the Government intends to use any testimony under Rules 702, 703, or 705 of the Federal Rules of Evidence, this Court order the Government to make a sufficiently detailed written summary of such testimony so that defendant is able to assess the admissibility of such testimony.

In making this motion, the defendant also moves this Court to exclude any expert witness testimony requested but not disclosed by the Government in a timely fashion so that the defendant may prepare to meet such allegations.

DATED this 15<sup>th</sup> day of January 2010.

/s/ Mark Moffat  
MARK R. MOFFAT  
Attorney for Defendant

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